

MARGARET M. SHALLEY  
& ASSOCIATES, LLC

OF COUNSEL:  
JAMES M. BRANDEN  
JAMES SHALLEY

April 7, 2014

**VIA ECF**

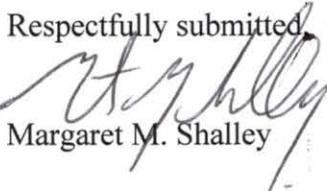
The Honorable Kiyo A. Matsumoto  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Phillip Baynes*  
15 Cr. 139 (KAM)**

Dear Judge Matsumoto:

I represent Phillip Baynes, the defendant in the above-referenced case. This letter is respectfully submitted to request an adjournment of the defendant's arraignment. Mr. Baynes is currently a patient at New York Methodist Hospital, located at 506 Sixth Street in Park Slope, Brooklyn. Approximately one week ago, Mr. Baynes' wife brought him to the hospital after the police found him wandering the streets and had escorted him home. He has remained in the hospital for the past week after presenting with memory loss, a seizure and dizziness. Mr. Baynes has been admitted to the hospital three times in the past fifteen months and has had three additional emergency room visits. The first of these hospitalizations occurred on December 6, 2013, after he was found unconscious by his wife. He had exhibited incoherent speech, reported having hallucinations, and could not remember the names of his family members. With respect to his current hospital admission, Mr. Baynes has been confused, disoriented and has forgotten where he lives. He is currently undergoing a battery of tests and awaiting a final diagnosis. The attending physician, Dr. Cherubin, has suggested to Mr. Baynes' wife that Mr. Baynes may be suffering from early onset Alzheimer's disease. Accordingly, counsel waives speedy arraignment from April 6, 2015 until April 17, 2015. Counsel will update the Court concerning Mr. Baynes' medical condition. The Court's time and attention to this matter is greatly appreciated.

Respectfully submitted,

  
Margaret M. Shalley

CC: AUSA Brittney Campbell  
*Via electronic mail*